

As an experienced CFII, I wish to comment on the proposal to establish a restricted area, R-2503D, from the surface to 11,000 feet at Camp Pendelton, north of San Diego. This area is along V-23 and is very heavily used as one of two principle routes into and out of the region. As proposed, this restricted area will force all aircraft out to sea by about 2 miles. It is very common in the spring and early summer to have a low overcast of about 2,000 feet. To remain legal VFR, most aircraft operate at about 1,500 feet along the coast. Since there is no practical way without GPS to determine when you are safely clear of the proposed restricted airspace, the tendency will be to go well off-shore to avoid the area. This will place many aircraft in the position of requiring over-water survival gear because they now exceed the gliding distance to shore. This type of equipment is rarely used (and is not generally available) locally. Further, most single engine private pilots experiencing difficulties under the above circumstances will be very reluctant to turn toward the shore and risk an FAA airspace violation even though experiencing a legitimate emergency. The tendency will be to attempt an off-shore ditching with probable loss of life as well as the aircraft. It would be a significant improvement in safety if the southwest edge of the the proposed restricted area could be moved to follow the shore line, or even better, move it inland slightly to follow the freeway (Highway 5). Both are clearly shown on the Los Angeles Sectional chart and the San Diego VFR Terminal Area chart.

There is also another problem with the proposed restricted air space. As proposed, the lower (southwest) corner of the restriction will block the VOR approaches for both Oceanside and Carlsbad (McClellan-Palomar) airports. The outbound radial for both approaches is on the 270 degree radial of Oceanside VOR and this will penetrate the southern edge of the proposed restricted airspace since it parallels the 240 degree radial less than one mile north of the VOR station. Both airports are heavily used for both practice and actual instrument approaches. It is suggested that the southern edge of the airspace be moved further north to provide adequate clearance and meet the TERPS requirements for the instrument approaches.